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Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building, 1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Comments on the HPV Test Plan for 2,5-dihydrothiophene 1,1-dioxide

Dear Administrator Leavitt:

The following comments on CP Chem's test plan for the chemical 2,5-dihydrothiophene 1,1-dioxide are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

Chevron Phillips Chemical Company LP submitted its test plan on April 6, 2004, for the chemical 2,5-dihydrothiophene 1,1-dioxide (CAS No. 77-79-2), also known as Sulfolene. Sulfolene is an organosulfur compound used as a solvent in petroleum refinement and as a chemical intermediate in the production of Sulfolane (CAS No. 126-33-0). CPChem has submitted a comprehensive analysis of Sulfolene by compiling existing data from a variety of sources to fulfill almost all SIDS endpoints. Data were not located for reproductive and developmental toxicity of Sulfolene, but data on a close structural analog, Sulfolane, was used to bridge data gaps for these endpoints. As indicated in the test plan, Sulfolene and Sulfolane share a similar order of toxicity and have a common mode of action. The use of data from analogous chemicals to bridge data gaps for SIDS endpoints is a scientifically valid analysis for considering the toxicity of a chemical. This approach demonstrates a thoughtful analysis by CPChem and adheres to EPA's recommendation that "participants maximize the use of existing and scientifically adequate data to minimize further testing". We concur that no animal testing is required for Sulfolene under the HPV Challenge program.

We commend the sponsor on a well-written, thorough test plan for Sulfolene. Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 327, or via e-mail at *meven@pcrm.org*.

Sincerely,

Megha Even, M.S.
Research Analyst

Chad B. Sandusky, Ph.D.
Director of Toxicology and Research